

243125

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Northern Division**

MANOR CARE OF AMERICA, INC.

Plaintiff,

v.

PROPERTY & CASUALTY INSURANCE  
GUARANTY CORPORATION,

Defendant.

Civil Action No.  
02-CV-04206 (BEL)

**JOINT STATUS REPORT**

On December 1, 2006, the parties filed a Joint Status Report. In that Report the plaintiff indicated that it intended to provide certain requested information to the defendant by December 15, 2006. The plaintiff has not yet been able to provide this information to the defendant. The defendant has requested the plaintiff to produce various corporate documents concerning numerous corporate entities during the period 1993 – 1997. The plaintiff has worked diligently on obtaining this information but has not completed its search of its records. Because the records are 10 – 14 years old, the plaintiff's search for these records has been complicated and burdensome. The plaintiff now anticipates that records that are available during that time period will be provided to defense counsel by February 28, 2007. Upon receipt of that information, the defendant will advise the plaintiff of those claims they are honoring and those they are denying by April 2, 2007. By April 16, 2007, the parties will report to the Court as to a future discovery

plan in order to resolve the underlying disputed claims. The parties anticipate that the unresolved disputed claims will then be subject to summary judgment or trial.

Respectfully submitted,



James H. Hulme, Bar No. 00875  
Deanne M. Ottaviano, Bar No. 15659  
ARENT FOX KINTNER PLOTKIN &  
KAHN, PLLC  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5339  
Ph: (202) 857-6000  
Fax: (202) 857-6395  
*Attorneys for Plaintiff*



Albert J. Mezzanotte, Jr., Bar No. 00197  
Edward M. Buxbaum, Bar No. 05015  
WHITEFORD, TAYLOR & PRESTON  
L.L.P.  
Seven Saint Paul Street  
Baltimore, MD 21202-1626  
Ph: (410) 347-8700  
Fax: (410) 752-7092  
*Attorneys for Defendants*



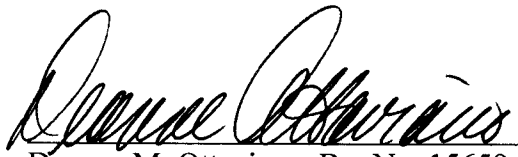
Gerald R. Kowalski, Pro Hac Vice  
COOPER & WALINSKI, L.P.A.  
900 Adams Street  
Toledo, OH 43604  
Ph: (419) 241-1200  
Fax: (419) 242-7212  
*Attorney for Plaintiff*

**SO APPROVED:**

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The Honorable Benson E. Legg, Judge

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 1<sup>st</sup> day of February, 2007, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system

  
Deanne M. Ottaviano, Bar No. 15659